

Application No. 09/369,490

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**REMARKS**

Claims 51-88 are currently pending in this application. No amendments are made in this response.

**Preliminary Comment**

On page 3 of the Official Action, the Examiner gave a limited reply to Applicant's previous response. Page 3 is entirely unresponsive to 1) the amendment of claim 51, 2) the limitation "special tags not defined in HTML but recognized by the parent process", 3) analysis of Hoffman as teaching stateless text filtering, and 4) various arguments regarding dependent claims 60-63 and the corresponding device claims. Applicants respectfully request that finality be withdrawn because the issues have not been fully aired. An RCE has already been filed, so a more complete response to carefully outlined arguments would be appropriate. On appeal, the Examiner's recent lack of responsiveness would leave the Examiner nothing to argue.

1) The amendment of claim 51 was discussed on page 10 of the previous response. The Examiner's rejection under Section 112 of database manipulation as not enabled is discussed below. A rejection under Section 112 does not meet the Examiner's obligation to address the new limitation before making a Section 102 rejection.

2) The limitation "special tags not defined in HTML but recognized by the parent process" was discussed during the interview and addressed on page 8 of the previous response. For some reason, the Examiner's characterization in page 3 of arguments made by Applicant uses ellipses where the words of this limitation should appear. Page 3 misses acknowledging this limitation. This limitation is not met in page 3 or by the passages previously cited by the Examiner, for the reasons provided on page 8 of the previous response.

3) The analysis of Hoffman as teaching stateless text filtering appears on page 9 of the previous response. The word "stateless" does not appear anywhere in the Official Action.

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4) The limitations of claims 60 and 62; "modifying a system registry entry corresponding to the parent process" and "publishing a user-specific web page" are discussed on page 10 of the previous response, without reply from the Examiner.

In the following sections, we traverse the new and old rejections, repeating to whatever extent necessary for us to be responsive, the analysis previously given, to which there was no reply.

#### **Claim Rejections under 35 USC 112**

The Examiner rejects claims 51, 64, 79-81, and 85-87 under 35 USC 112, first paragraph, as failing to comply with the enablement requirement. These claims were amended in the previous response to include the limitation "manipulating a persistent database under control of the parent process". In each of the rejections, the Examiner states, "the specification does not adequately describe database manipulation, and persistent database".

We note the Examiner has implicitly accepted that no new subject matter is introduced with this limitation. On pages 10-11 of the previous response, we identified support for this limitation.

We further note that the specification and original claims 6-8 describe modification of a system registry, for instance on page 7 and in original claims 6-8. There are literally dozens of mentions of this system registry in the original application. On page 32, the system registry is equated to a Windows registry. The Examiner has implicitly accepted that manipulation of the system registry based on name-value pairs that are extracted from the special key tags is adequately enabled. This is enough to establish enablement of manipulating a persistent database.

Those skilled in the art will recognize that the Windows system registry is a persistent database. Changing values in the Windows system registry manipulates that persistent database. Therefore, description of modifying system registry values is enabling for manipulation of a persistent database.

The rejections under Section 112 are thus traversed.

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**Claim Rejections under 35 USC 102**

The Examiner rejects **claims 51 and 64** both on pages 5 *et seq.* and in a limited reply on page 3. The rejection on pages 5-6 is virtually cut-and-pasted from the Examiner's prior rejection, without any acknowledgment that the claim was amended. No new citation or reasoning is provided in response to the amendment.

As we previously explained, Applicant amended independent claims 51 and 64 to emphasize the stateful manipulation of database entries, including storing, modifying and using persistent database entries. In newly added dependent claims 77 and 83, the text filtering process of "modifying the special key tags in the parent process, and passing the modified special key tags to the embedded web browser" is claimed as an additional step, distinct from database manipulation. This should make it clear that Hoffman's stateless text filtering is different than the claimed database manipulation. Therefore, independent claims 51 and 64 should be allowable as amended.

Hoffman lacks elements of the independent claims. During our interview, the Examiner stressed the architecture that Hoffman describes. This is not enough, because there is not any place in Hoffman that includes a third category of special key tags that can be analogized to a secret code. Hoffman's architecture is adapted to stateless text filtering, as might be performed by a word processor. In Hoffman's architecture, tags that are processed are first recognized as valid HTML tags that should be modified, and then the corresponding text string is modified and passed to a web browser. Modifications include a range of stateless text filtering. (col. 26 line 58 to line 67). Tags that are not processed are ignored and passed through unmodified. Hoffman does not have a third category of "special key tags that include auxiliary information, the special key tags not defined in HTML but recognized by the parent process", as claimed. Hoffman lacks any indication of processing tags that are not valid HTML tags. None of the passages cited by the Examiner makes any reference to processing tags that are not recognized as valid HTML tags. Therefore, a rejection under Section 102 cannot be supported by Hoffman.

The Examiner makes a new argument on pages 3-4, regarding the independent claims:

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CPA [Hoffman] clearly teaches browser content and tag-based command processing method for computer system that involves trapping tag-based command in received information of browser by processing command based on user-configurable setting. A particular server provides stream of information including a tag-based command to a browser, in response to the received fetch request. The tag-base command in the received information is trapped selectively-by identifying the command by type and by processing the identified command based on a user-configurable settings through the modification, deletion, replacement and passing of the command (background, and col. 7 line 48 to col. 8 line 53). CPA clearly teaches a method that involves receiving a user request at the browser for retrieval of the desired information from a particular server, based on the browser user-configurable settings indicating the particular processing of the tag-based command. The browser sends a fetch request to the particular server in response to the received user request, to retrieve the desired information (col. 5 line 22 to col. 8 line 53).

The Examiner's emphasis on user-configurable settings pinpoints a significant difference between Hoffman and the claimed invention. In Hoffman, the browser is pre-configured to act on the incoming stream of information as a stateless text filter. In the claimed invention, configuration information is received in the incoming stream of information. The behavior of the parent information is reconfigured by special key tags not defined in HTML that are part of the incoming stream of information. Even if everything that the Examiner says in the quoted passage above were conceded, for purposes of argument, that would not be a basis for rejection under Section 102. Hoffman simply does not anticipate the claims as presented.

Out of place, in argument about claims 52 *et seq.*, at the top of page 7, the Examiner refers to "not defined in HTML" and "database manipulation ... modifying at least one system registry entry". In context, the Examiner argues that Hoffman teaches, "special key tags include auxiliary information not defined in HTML but recognized by the parent process (col. 25 line 57 to line 67)". That is not what we claim and we cannot find the claimed feature in column 25. We claim, "special key tags not defined in HTML but recognized by the parent process" and previously argued that Hoffman recognizes valid HTML tags and then processes them as a stateless text filter. Special tags recognized as valid HTML tags including auxiliary information is not what we claim. Moreover, in column 25, Hoffman discusses tags as a unit, without any

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mention of auxiliary information. The cited passage does not meet the language of the independent claims.

Database manipulation is also mentioned at the top of page 7. The Examiner argues that Hoffman teaches, "database manipulation includes modifying at least one system registry entry corresponding to the parent application. (col. 8 line 33 to line 53, col. 3 line 39 to line 54)." In column 8, an "internal message or dispatcher loop ... 'switches' on different (HTML) tag types", sending them to handlers that match the recognized HTML tag type. The example given is "killing" advertising images on a web page. In passing, Hoffman says that the system also can synthesize new tags, at line 52, without elaboration. Applicant cannot find anything in this column 8 passage that relates to a system registry entry or manipulation of a database. In column 3, Hoffman says, in part, "At the level of the Filter method, the system can modify the command, delete the command, synthesize new commands, or pass through unchanged the existing command, thereby impacting how the system renders Web pages." Applicant cannot find anything in this passage either that relates to a system registry entry or manipulation of a database. (Also out of place, in argument about claims 53 *et seq.*, at the bottom of page 7, the Examiner again cites col. 8 line 33 to line 53, col. 3 line 39 to line 54, without adding any analysis.) These out-of-place citations do not meet the elements of independent claims 51 and 64 that they most nearly address.

On this basis, independent claims 51 and 64, and all the claims that depend from them, are allowable over the cited references.

For this response, Applicant contends that **claims 52-55 and 65-69** are allowable for at least the same reasons as independent claims 51 and 64.

The Examiner separately addresses dependent method **claims 56-60, 62, 88** and their corresponding device claims in section 3, on pages 6-7. Regarding **claims 57-60 and 62**, the Examiner argues that Hoffman teaches, "the special behavior includes: presenting a dialog box not found in the web page, presenting a set-up dialogue for the parent process, customizing operation of the parent process, presenting a sign-on dialogue not found in the web page (col. 4 line 47 to col. 5 line 1),

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modifying a system registry entry corresponding to the parent process (col. 3 line 14 to line 23), and publishing a user-specific web page (col. 8 line 21 to line 33)".

The limitation of **claim 56** is "wherein the special behavior includes presenting a dialog box not found in the web page." Applicant does not find any presentation of a dialog box not found in the incoming stream, responsive to processing of a special key tag, anywhere in Hoffman, much less in columns 4-5. Hoffman does not teach anything about the UI 260 that meets the claimed limitation. For this additional reason, claim 56 and the corresponding device claim are allowable over the cited references.

The limitation of **claim 57** is similar to claim 56, "wherein the special behavior includes presenting a set-up dialogue for the parent process." As we previously asserted, dependent claims 57-63 should be allowable, because Hoffman's stateless text filtering does not extend to the features in the dependent claims. In response to the claimed features, the Examiner cited [A] col. 3 line 14 to line 23, [B] col. 4 line 47 to col. 5 line 1, and [C] col. 8 line 21 to line 23, at the bottom of page 4 of the Official Action. Passage [A] describes a filtering architecture, but no particular result of stateless text filtering. Passage [B] describes the environment in which stateless text filtering is performed, but does not give any application of Hoffman's invention.

Passage [C] finally describes operation of Hoffman's stateless text filtering:

"Any such command is, however, trapped by the Filter module 225. The 'real' request is at this point processed by the Filter core logic (Filter method) 313. At this point, the system can modify the command, delete the command, synthesize new commands, or pass through unchanged the existing command."

None of these passages [A]-[C] and particularly not the substantive passage [C], meet the features claimed in dependent claims 57-63.

Hoffman does not include, as claimed in dependent claim 57, processing the special key tags in the parent process, including triggering of "presenting a set-up dialogue for the parent process". Hoffman's stateless text filtering, in the Examiner's analysis, is the parent process. The passages cited by the Examiner do not include "presenting a set-up dialogue for" Hoffman's filtering engine. The Examiner did not

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respond in the Official Action to this analysis. Therefore, claim 57 and the corresponding device claim should be allowable over the cited references.

The limitation of **claim 58** is, "wherein the special behavior includes customizing operation of the parent process." As we previously asserted, Hoffman does not include, as claimed in dependent claim 58, processing the special key tags in the parent process, including triggering of "customizing operation of the parent process". The passages cited by the Examiner do not include "customizing" Hoffman's filtering engine. The Examiner did not respond in the Official Action to this analysis. Therefore, claim 58 and the corresponding device claim should be allowable over the cited references.

The limitation of **claim 59** is, "wherein the special behavior includes presenting a sign-on dialogue not found in the web page." As we previously asserted, Hoffman does not include, as claimed in dependent claim 59, processing the special key tags in the parent process, including triggering of "presenting a sign-on dialogue not found in the web page". The passages cited by the Examiner do not include having Hoffman's filtering engine present "a sign-on dialogue not found in the web page". The Examiner did not respond in the Official Action to this analysis. Therefore, claim 59 and the corresponding device claim should be allowable over the cited references.

The limitation of **claim 60** is, "wherein the special behavior includes modifying a system registry entry corresponding to the parent process." As we previously argued, Hoffman does not include, as claimed in dependent claim 60, processing the special key tags in the parent process, including triggering of "modifying a system registry entry corresponding to the parent process". The passages cited by the Examiner do not include "modifying a system registry entry corresponding to" Hoffman's filtering engine. The Examiner did not respond in the Official Action to this analysis. Therefore, claim 60 and **61, which depends from 60**, and the corresponding device claims should be allowable over the cited references.

The limitation of **claim 62** is, "wherein the special behavior includes publishing a user-specific web page." As we previously asserted, Hoffman does not include, as claimed in dependent claim 62, processing the special key tags in the parent process, including triggering of "publishing a user-specific web page". The passages cited by the Examiner do not include having Hoffman's filtering engine customize the dialogue with

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the web server by "publishing a user-specific web page". The Examiner did not respond in the Official Action to this analysis. Therefore, claim 62 and 63, which depends from 62, and the corresponding device claims should be allowable over the cited references.

The limitation of **claim 88** is, "wherein the database manipulation includes modifying at least one system registry entry corresponding to the parent application." The Examiner's citation of columns 8 and 3 is fully discussed above. Therefore, claim 88 should be allowable over the cited references.


### CONCLUSION

In view of the foregoing remarks, it is believed that all claims are in condition for allowance.

The undersigned normally can be reached between 8:30 a.m. and 5:30 p.m., excepting lunch, at the number listed below.

Respectfully submitted,

Dated: 29 June 2004

  
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